

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

BY: D. Trujillo  
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## INTRODUCTION

At all relevant times during this Indictment, Title 18, United States Code, Section 923(g)(1)(A) required all Federal Firearms Licensees to keep accurate records of importation, production, shipment, receipt sale or other disposition of firearms at the place of business. One of the records Federal Firearms Licensees (FFLs) are required to keep is the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Firearm Transaction Record (Form 4473). The ATF Form 4473 requires the Buyer of the firearm to fill out Section A, which requires the Buyer's full name, address, date of birth, and other identifying information. Additionally, Question 21a on the Form 4473 asks whether the person completing the form is the "actual transferee/buyer of the firearm(s) listed on the form." The question also includes a warning that if "[y]ou are not the actual

transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you.”

Additionally, the purchaser’s certification, documented with a signature in block “22.” of the Form 4473, explicitly states that making any false oral or written statement, or exhibiting any false or misrepresented identification with respect to this transaction is a crime punishable as a felony under Federal Law.

At all relevant times, persons under indictment for a crime punishable by more than one year are prohibited from shipping, transporting, or receiving firearms that have been shipped or transported in interstate commerce.

At all relevant times, persons convicted of a crime punishable by more than one year are prohibited from possessing firearms that have been shipped or transported in interstate commerce.

THE GRAND JURY CHARGES:

**COUNT ONE**

The Introduction of this Indictment is hereby incorporated by reference as if fully set forth herein.

That beginning on or about April 18, 2024, and continuing through June 7, 2024, within the Western District of Texas, the Defendants,

- (1) ROMANNIE SHROUDER,**
- (2) COREY THOMPSON,**
- (3) DOMINIC MUESE-ILOILO,**
- (4) DYLAN YENNIOR, and**
- (5) AMARION KINDS,**

in connection with the acquisition of firearms from Federal Firearms Licensees, knowingly made false and fictitious written statements intended and likely to deceive said Federal Firearms Licensees, in that Defendants **(3) DOMINIC MUESE-ILOILO, (4) DYLAN YENNIOR, and (5) AMARION KINDS** each falsely indicated on ATF Form 4473's that they were the actual transferee/buyers of firearms they purchased from the Federal Firearms Licensees, when in fact Defendants **(3) DOMINIC MUESE-ILOILO, (4) DYLAN YENNIOR, and (5) AMARION KINDS** each knew they were not the actual transferee/buyers, and they were purchasing the firearms for another person and not themselves, and Defendants **(1) ROMMANIE SHROUDER** and **(2) COREY THOMPSON** aided and abetted the same, all in violation of Title 18, United States Code, Section 922(a)(6), and Title 18, United States Code, Section 2.

### **COUNT TWO**

The Introduction of this Indictment is hereby incorporated by reference as if fully set forth herein.

That beginning on or about April 18, 2024, and continuing through June 7, 2024, within the Western District of Texas, the Defendants,

#### **(1) ROMANNIE SHROUDER, and (2) COREY THOMPSON,**

received from another person firearms in or otherwise affecting interstate and foreign commerce, to wit: multiple Glock handguns, Fabrique Nationale Model SCAR rifles, and Century Arms model VSKA rifles, when the Defendants knew and had reasonable cause to believe that such receipt would constitute a felony, to wit: 18 U.S.C. 922(n) Receiving Firearm while under Indictment and 18 U.S.C. 922(g)(1) Felon in Possession of Firearm, aided and abetted the same, and attempted and conspired with each other to do the same. All in violation of Title 18, United States Code, Section 933(a)(2), 933(a)(3), and 933(b), and Title 18, United States Code, Section 2.

**COUNT THREE**

That beginning on or about April 18, 2024, and continuing through June 7, 2024, within the Western District of Texas, the Defendant,

**(1) ROMANNIE SHROUDER,**

shipped, transported, and received any firearm or ammunition which has been shipped or transported in interstate commerce, to wit: multiple Glock handguns, Fabrique Nationale Model SCAR rifles, and Century Arms model VSKA rifles, while Defendant was a person who was under indictment for a crime punishable by imprisonment for a term exceeding one year, to wit, Aggravated Assault with a Deadly Weapon, Case No. 20230D00765 in El Paso County, Texas, all in violation of Title 18 United States Code Section 922 (n).

**COUNT FOUR**

That beginning on or about April 18, 2024, and continuing through June 7, 2024, within the Western District of Texas, the Defendant,

**(2) COREY THOMPSON,**

knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm which had been shipped or transported in interstate

commerce, to wit: multiple Glock handguns, Fabrique Nationale Model SCAR rifles, and Century Arms model VSKA rifles, all in violation of Title 18 United States Code Section 922(g)(1).

A TRUE BILL.



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FOREPERSON OF THE GRAND JURY

MARGARET F. LEACHMAN  
ACTING UNITED STATES ATTORNEY

BY:   
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Assistant United States Attorney